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November 19, 2021

BY ECF

The Honorable Loretta A. Preska
United States District Court for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 2220
New York, NY 10007

**Re: *Alicea v. City of New York, et al.*, No. 16-cv-07347-LAP: Request to
Extend Joint Pre-Trial Motion Deadline**

Dear Judge Preska:

We are *pro bono* counsel for plaintiff in the above-captioned action, Dave Alicea, who is incarcerated at Woodbourne Correctional Facility, and we respectfully submit this joint letter with counsel for Defendants. On September 24, 2021, at the request of the parties, the Court entered an order (the "Order") setting a deadline of November 23, 2021 for the parties to file a joint pre-trial order. The parties hereby respectfully request that the Court extend the deadline to file a joint pre-trial order to February 24, 2022. The parties have not made any previous request to extend the deadline set forth in the Order.

The grounds for this request are that counsel for plaintiff has experienced difficulty conferring with Mr. Alicea following his transfer to Woodbourne Correctional Facility, and principal counsel for Defendants, Brachah Goykadosh, will be leaving the Law Department for a clerkship that starts in February 2022 and Defendants have therefore requested additional time for a new assigned attorney to become acquainted with this case.

Accordingly, the parties respectfully request that the Court extend the deadline to submit a joint pretrial order to February 24, 2022.

The parties are available at the Court's convenience should the Court have any questions.

SO ORDERED.

Dated: November 22, 2021
New York, New York

A handwritten signature in cursive script that reads "Loretta A. Preska".

LORETTA A. PRESKA

Senior United States District Judge

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Respectfully submitted,

/s Adam M. Harris
Adam M. Harris

cc: Counsel for Defendants (By ECF)